

Robert F. Renaud, Esq.
RR1351
RENAUD DEAPOLONIO LLC
190 North Avenue East
Cranford, New Jersey 07016
(908) 418-4088
Attorneys for Intervenor Regular Democratic Organization of Union County, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CHRISTINE CONFORTI, ARATI
KREIBICH, MICO LUCIDE, JOSPEH
MARCHICA, KEVIN McMILLAN,
ZINOVIA SPEZAKIS, and NEW JERSEY
WORKING FAMILIES ALLIANCE, INC.,

Plaintiff,

v.

CHRISTINE GIORDANO HANLON, in
her official capacity as Monmouth County
Clerk, SCOTT M. COLABELLA, in his
official capacity as Ocean County Clerk,
PAULA SOLLAMI COVELLO, in her
official capacity as Mercer County Clerk,
JOHN S. HOGAN, in his official capacity
as Bergen County Clerk, EDWARD P.
MCGETTIGAN, in his official capacity as
Atlantic County Clerk, and E. JUNIOR
MALDONADO, in his official capacity as
Hudson County Clerk,

Defendants.

Civil Action No.: 3:20-08267-ZNQ-TJB

CERTIFICATION OF COUNSEL

Robert F. Renaud, Esq., hereby certifies as follows:

1. I am an attorney at law of the State of New Jersey and a member of the firm Renaud DeAppolonio LLC, attorneys for Intervenor Regular Democratic Organization of Union County, Inc. ("the RDO"). I am personally handling this matter and am familiar with the facts of this case

as they relate to the RDO.

2. This Certification is submitted in support RDO's Motion to Intervene pursuant to Fed.R.Civ.P. 24.

3. Regular Democratic Organization of Union County, Inc. is a not-for-profit corporation of the State of New Jersey

4. The RDO is an organization dedicated to democratic principles and the highest ideals, supporting candidates for the nomination of the Democratic Party in primary elections for public offices, including United States Senate and Congress, State Senate and Assembly, Constitutional County offices, members of the Board of Commissioners, and municipal offices.

5. Qualified members of the Democratic Party may, pursuant to N.J.S.A. 19:23-17, be permitted to use the designation "Regular Democratic Organization of Union County," as their designation or slogan in primary elections.

6. The RDO, by doing so, "endorses" those candidates who adopt and share the principles and ideals of the RDO.

7. The RDO claims an interest, protected by the First Amendment, to associate itself with primary election candidates who share its principles and ideals, and to associate those candidates with each other, and to inform the primary election voters of the Democratic Party. The RDO further claims an interest, protected by the First Amendment, to speak freely as to those candidates that it has endorsed so as to inform the electorate that the RDO has chosen to associate itself with certain candidates, and that those candidates have chosen to associate themselves with each other.

8. Given the nature of the organization and the legal principles at issue in this litigation, RDO claims an interest pursuant to Fed.R.Civ.P. 24 (a) because the disposition of the subject of

this action, pertaining as to does to ballot placement and bracketing, may impair or impede the RDO's ability to carry out its core function, that is, the ability to endorse candidates on the ballot, and to have those endorsed candidates be associated with each other on the ballot.

9. Alternatively, the RDO has claims or defenses pursuant to Fed.R.Civ.P. 24 (b), that is, its First Amendment claims set forth above, that present common questions of law and fact with the claims and defenses of the existing parties

10. Accordingly, pursuant to Fed.R.Civ.P. 24(a) and/or (b), Regular Democratic Organization of Union County, Inc. requests that the court grant its motion to intervene in this litigation.

CERTIFICATION

I certify that the above statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

s/Robert F. Renaud

Robert. F. Renaud, Esq.

Dated: July 25, 2022